

STEPHEN R. HARRIS, ESQ.
Nevada Bar No. 001463
HARRIS LAW PRACTICE LLC
6151 Lakeside Drive, Suite 2100
Reno, NV 89511
Telephone: (775) 786-7600
E-Mail: steve@harrislawreno.com
Attorneys for Debtor

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEVADA

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IN RE: Case No. 21-50466-btb
(Chapter 13)

JULIANA MAYER LOZA,

Debtor.

**EX-PARTE MOTION FOR ORDER
SHORTENING TIME**

Hearing Date: N/A
Hearing Time:

SUMMARY IMPACT OF REQUEST TO SHORTEN TIME

The subject Motion on which an Order Shortening Time is requested herein will have an estimated 30 minute impact on the Court's calendar.

JULIANA MAYER LOZA ("Debtor"), by and through her attorney STEPHEN R. HARRIS, ESQ. of HARRIS LAW PRACTICE LLC, hereby moves and represents as follows:

1. Debtor filed a Voluntary Petition for Chapter 13 relief on June 22, 2021.
2. On June 24, 2021, Debtor filed her DEBTOR'S MOTION FOR SANCTIONS AGAINST LEVERTY & ASSOCIATES LAW, CHTD. AND ALLIED FORECLOSURE SERVICES FOR WILLFUL VIOLATION OF THE § 362(a) AUTOMATIC STAY AND TO DECLARE FORECLOSURE SALE VOID AB INITIO (Docket No. 7) ("Motion").
3. The Motion seeks an Order: (1) Compelling Leverty & Associates Law, CHTD.

1 and Allied Foreclosure Services to cancel any trustee sale deeds issued at the Real Property
 2 trustee's foreclosure sale; (2) finding that the Real Property trustee's foreclosure sale was
 3 conducted in violation of the 11 U.S.C. § 362(a) automatic stay and is void and of no effect; (3)
 4 finding that Leverty & Associates Law, CHTD. and Allied Foreclosure Services knowingly and
 5 willfully violated the automatic stay; (4) awarding Debtor emotional distress damages in the
 6 amount of \$50,000; (5) awarding Debtor punitive damages in the amount of \$50,000, or more;
 7 (6) awarding Debtor her actual attorneys' fees and costs incurred in recovering her Real Property,
 8 estimated at \$10,000.00, to be determined after this Motion is fully adjudicated.

9 4. Time is of the essence in hearing the Motion because the trustee's foreclosure sale
 10 of the Debtor's real property in violation of the automatic stay occurred on June 23, 2021, and
 11 although the sale is void, the Debtor is suffering emotional distress due to Leverty & Associates
 12 Law, CHTD. and Allied Foreclosure Services' reckless actions.

13 5. Debtor will provide notice of the Motion via email or facsimile to Leverty &
 14 Associates Law, CHTD.'s counsel and Allied Foreclosure Services' counsel. All other creditors
 15 shall receive notice of the Motion via regular U.S. Mail unless the Debtor can obtain email
 16 addresses or facsimile numbers for such creditors.

17 WHEREFORE, Debtor respectfully requests that this Court enter an order shortening the
 18 time for notice of hearing with respect to her DEBTOR'S MOTION FOR SANCTIONS
 19 AGAINST LEVERTY & ASSOCIATES LAW, CHTD. AND ALLIED FORECLOSURE
 20 SERVICES FOR WILLFUL VIOLATION OF THE § 362(a) AUTOMATIC STAY AND TO
 21 DECLARE FORECLOSURE SALE VOID AB INITIO (Docket No. 7), so that such hearing may
 22 be held by this Court on or before June 28, 2021, or as soon thereafter as may be convenient to
 23 this Court's calendar; and for such other and further relief as the Court deems just under the
 24 circumstances.

25 DATED this 24th day of June 2021.

26 STEPHEN R. HARRIS, ESQ.
 27 HARRIS LAW PRACTICE LLC
 /s/ Stephen R. Harris

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 Attorneys for Debtor